

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

| Plaintiffs' Executive Committee for Personal Injury and Death Claims   | Plaintiffs' Executive Committee for Commercial Claims                               |
|--|---|
| Ronald L. Motley (1944-2013)<br>Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i><br>MOTLEY RICE LLC<br>James P. Kreindler, <i>Co-Chair</i><br>KREINDLER & KREINDLER LLP | Stephen A. Cozen, <i>Co-Chair</i><br>Sean Carter, <i>Co-Chair</i><br>COZEN O'CONNOR |
| Andrew J. Maloney III, <i>Co-Liaison Counsel</i><br>KREINDLER & KREINDLER LLP<br>Robert T. Haefele, <i>Co-Liaison Counsel</i><br>MOTLEY RICE LLC                                     | J. Scott Tarbutton, <i>Liaison Counsel</i><br>COZEN O'CONNOR                        |

Via ECF and Federal Express

February 14, 2020

The Honorable George B. Daniels  
U.S. District Judge  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD)*  
*(SN); Estate of John P. O'Neill, Sr., et al. v. Republic of the Sudan, et al.,*  
*No. 18-cv-12114 (GBD) (SN); Estate of John P. O'Neill, Sr., et al. v.*  
*Kingdom of Saudi Arabia, et al., No. 04-cv-1922 (GBD) (SN)*

Dear Judge Daniels:

I write on behalf of the *O'Neill* plaintiffs in the above-captioned matters and on behalf of the Plaintiffs' Executive Committees (the "PECs") with regard to the Motion to Dismiss ("Motion") recently filed by the Republic of the Sudan ("Sudan"). MDL ECF No. 5824. On February 3, 2020, Sudan moved to dismiss two *O'Neill* actions, one filed in March 2004, and one filed in December 2018. Currently, the deadline to file an Opposition to the Motion is February 18, 2020.

Following the filing of the Motion, the PECs contacted counsel for Sudan to provide information concerning the status of other claims against Sudan in the MDL, and to discuss whether any coordination of proceedings as to Sudan is warranted. During a call on February 12, 2020, the PECs agreed to provide counsel for Sudan with a proposal on possible coordination of the proceedings as to Sudan, and the parties agreed it would be prudent to defer further briefing on the Motion filed by Sudan in the *O'Neill* cases pending those discussions.

Accordingly, the parties respectfully request that the Court enter an Order deferring further briefing on Sudan's Motion in the *O'Neill* cases, while the parties discuss the possible coordination of proceedings as to Sudan in the MDL.

The Honorable George B. Daniels  
February 14, 2020  
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We thank the Court for its attention to this matter.

Very truly yours,

KREINDLER & KREINDLER LLP

/s/ James P. Kreindler

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*For the Plaintiffs' Exec. Committees and  
the O'Neill Plaintiffs*

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All Counsel of Record via ECF